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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

February 21, 2022

## BY ECF AND EMAIL

Honorable Naomi Reice Buchwald United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Jonathan Griffin

17 Cr. 609 (NRB)

Dear Judge Buchwald:

The Government submits this letter to respectfully request that chronologies maintained by the United States Probation Office ("Probation"), detailing Jonathan Griffin's supervision, be unsealed. As Your Honor is aware, the VOSR pending before the Court involves six specifications: (1) use of a controlled substance; (2) failure to report for drug testing; (3) failure to follow the instructions of Probation to meet with a reentry specialist; (4) failure to notify Probation of a change in residence; (5) failure to report to Probation; and (6) failure to participate in mental health treatment. Given the nature of the specifications, the Government intends to call one or more Probation Officers to testify at the hearing scheduled for March 1.

The chronologies maintained by the United States Probation Office contain material relevant to the hearing, and the Government understands that they may be unsealed only upon a Court order. In addition, once in possession of the files, the Government must disclose them to the defendant pursuant to Title 18, United States Code, Section 3500 and/or pursuant to its obligations under *Brady v. Maryland*, 373 U.S. 83 (1963) and *Giglio v. United States*, 405 U.S.

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150, 154 (1972). Accordingly, the Government respectfully requests that the chronologies by ordered unsealed.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

By

Jordan Estes

Assistant United States Attorney

(212) 637-2543

cc: Marlon Kirton, Esq. (by ECF)

SO ORDERED:

The Honorable Naomi Reice Buchwald

United States District Judge